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January 25, 2016

The Honorable William H. Pauley III
United States District Judge
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street
New York, NY 10007-1312

RE: *The Dial Corporation, et al. v. News Corporation, et al.*, No. 13-cv-06802 (WHP)
(S.D.N.Y.)

Dear Judge Pauley:

We write to inform the Court that we represent a number of class members in connection with *The Dial Corporation, et al. v. News Corporation, et al.* litigation. These class members are aware that there are settlement discussions ongoing, pursuant to procedures established by this Court. We have been asked to communicate with News America Marketing and its outside counsel at Paul, Weiss, Rifkind, Wharton & Garrison, LLP, to discuss the possible resolution of our clients' claims in this matter.

We have reviewed the Court's orders in this matter concerning settlement discussions with absent class members and it does not appear that they address communications by outside counsel. In order to comply with the spirit of the Court's orders, we plan to identify the class members we represent to Class Counsel.

In light of the approaching February 23 deadline, we would like to commence these discussions with Paul, Weiss promptly. We stand ready to address any questions or concerns the Court may have.

Very truly yours,

A handwritten signature in blue ink that reads "Daniel A. Sasse".

Daniel A. Sasse

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cc: Steven F. Benz, Esq., Kellogg, Huber, Hansen, Todd Evans & Figel, PLLC
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